

# HELLERSTEIN & COMPANY

January 26, 2022

VIA ECF

The Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

Re: In re Application of Vale S.A. et al., No. 20-mc-199-JGK-OTW

Dear Judge Wang:

I write on behalf of Perfectus in response to Jeffrey A. Rosenthal's letter to Your Honor, ECF No. 125.

Our intention is to comply fully with your Honor's order dated January 6, 2022.

Vale counsel is attempting to reintroduce a notice of deposition for that was specifically rejected by Your Honor on December 7, 2021. Your Honor specifically rejected Vale's request to take the deposition of Gregg Blackstock, personally, and ordered only the deposition of the entity, Perfectus.

In Vale counsel's December 17, 2021 letter, so ordered by Your Honor, Vale counsel requested a deposition of Perfectus to examine two matters: 1) certain alleged gaps and delays in the production of documents; and 2) discrepancy in various organizational charts produced. In compliance with Your Honor's Order, Perfectus designated Gregg Blackstock to appear on its behalf and answer questions on the above matters. Vale counsel is now attempting to use the deposition to improperly examine Mr. Blackstock on confidential and irrelevant matters that are outside the scope of Your Honor's Order and the original Subpoena.

Respectfully submitted,

  
Joseph Z. Hellerstein